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 Attorney for Plaintiff

**UNITED STATES DISTRICT COURT  
 DISTRICT OF NEVADA**

RONITA ELEASE ELDER,

Plaintiff,

v.

MARTIN O'MALLEY,  
 COMMISSIONER OF SOCIAL SECURITY,

Defendant.

)  
 )  
 ) CASE NO.  
 ) 2:23-cv-01697-JCM-DJA  
 )  
 ) **UNOPPOSED MOTION**  
 ) **FOR EXTENSION OF TIME TO FILE**  
 ) **PLAINTIFF'S BRIEF**

Plaintiff, Ronita Elease Elder, by her attorney, moves for a forty-six (46) day extension of time to file Plaintiff's opening brief. Plaintiff's opening brief is currently due to be filed February 1, 2024.

Counsel requests this extension due to multiple, simultaneous filing deadlines. Counsel requires additional time to properly and thoroughly prepare Plaintiff's brief. For instance, between January 12, and March 15, 2024, staff in Counsel's office have one hundred and sixty-four (164) Plaintiff briefs due. This figure does not include briefings which will be due after the filing of Administrative Records throughout this timeframe, Oral Arguments, appeals to Circuit Courts, Reply Briefs, settlement negotiations, and the various other tasks which arise throughout the course of litigation. These circumstances do not allow for Plaintiff's Counsel to properly

1 prepare the brief by the current deadline. This request will not cause Defendant any undue  
2 hardship. This extension is needed to thoroughly and properly prepare the brief.

3 Wherefore, Plaintiff requests an extension from February 1, 2024, up to and including  
4 March 18, 2024, to file his brief. Counsel for the Plaintiff has conferred with Defendant's  
5 Counsel who kindly has no objection to this request.

6 Dated January 22, 2024.

7 Respectfully submitted,

8 /s/Hal Taylor  
9 Hal Taylor, Esq.

10 **Plaintiff's Certificate of Service:**

11 I certify that I caused the Unopposed Motion for Extension of Time to be served today,  
12 January 22, 2024, by CME/CF to Blaine T. Welsh, Esq., and L. Jamala Edwards, Esq., who are  
13 filing users of the CM/ECF system.

14 /s/Hal Taylor  
15 Hal Taylor

16 **IT IS SO ORDERED.**

17 DATED: 1/23/2024

18   
19 \_\_\_\_\_  
20 DANIEL J. ALBREGTS  
21 UNITED STATES MAGISTRATE JUDGE